BWP/CERO
Compliance Evaluation Inspection Report

Note: Inspection documents are enforcement sensitive and not considered public records until after all associated enforcement is finalized by MassDEP

Facility Name: Rex Lumber Company
840 Main Street
Acton, MA 01720

FMF #: 130047

Inspection Date: August 1, 2013
Report Date: October 16, 2013
MassDEP Inspector: Michelle Delemarre

Inspection Type: Unannounced Multi-Media

FACILITY INFORMATION

Facility Representative: David Chambers, Safety Director, and Dean Prentiss, Kiln Operator
Number of Employees: ~ 70-75

PERMIT HISTORY and Status Information:

AQ:	Air Classification: Non-Major, Less than 25% of Major Source Threshold Source Registration: 1190997
HW:	Hazardous Waste Status: Very Small Quantity Generator of Hazardous Waste and Non-Notifier for Waste Oil HW ID #: MAD007997927
IWW:	Industrial Wastewater Classification: None generated
TURA:	Not applicable

ENFORCEMENT HISTORY:

Date Of Last Inspection: October 8, 1987 Inspector: Maria L'Annunziata
Enforcement Action: None

COMPLIANCE ASSESSMENT (According to guidance protocol, was any non-compliance found in):

Air Quality	Yes X No __
Hazardous Waste (RCRA)	Yes X No __
Industrial Wastewater	Yes ___ No X
TURA	Yes ___ No X
Solid Waste	Yes ___ No X
Referral needed other program	Yes ___ No X

A. VIOLATION SUMMARY

1. The company did not register its waste oil status.
2. The company did not operate the opacity monitor for the wood fired furnace.
3. The company did not install and operate an opacity monitor for the sawdust boiler.

B. GENERAL FACILITY DESCRIPTION

The facility purchases lumber and kiln dries it. It also cuts lumber into mouldings and will sand lumber to customer specification.

C. PROCESS/WASTE MANAGEMENT/RECORD KEEPING SUMMARY

UO#1 - Kiln Drying
UO#2- Moulding and Milling
UO#3- Maintenance Garage

WMO#1 – Hazardous Waste Management
WMO#2 – Wood Fired Furnace
WMO#3– Saw Dust Fired Boiler

D. PROCESS DESCRIPTION

UO#1 – Kiln Drying

Lumber is received on pallets from around the world and is sorted by grade, width, etc. It is allowed to air dry when it first arrives at the facility to season as needed. Then it is kiln dried in one of the facility's 8 drying kilns. Four of the kilns are rated at 50,000 board foot capacity and the other 4 are rated at 25,000 board foot capacity. The kilns are heated by the facility's saw dust fired boiler. (See WMO#3)

UO#2 – Moulding and Milling

The company makes mouldings and smoothes lumber to customer specification. The company has a building where the planers, saws, and moulding machines are located. The exhaust from the machines in this area are controlled by a Pneumafil baghouse and cyclone system.

Waste Streams

Air Quality – The baghouse is vented internally during winter months to provide heat for employees. The cyclone conveys the larger sawdust particles to the facility's saw dust fired boiler. (See WMO#3)

UO#3 – Maintenance Garage

A small maintenance garage is used to support the facility's operations and maintain the facility's trucks and fork lifts. The company has 2 tractor trailers and 3 ten wheeled trucks. The company uses a Safety Kleen parts washer with Safety Kleen Premium Solvent 150 cleaning solution.

Waste Streams

Industrial Wastewater – None generated. The trucks are washed at an off-site location.

Hazardous Waste – Waste crankcase oil and hydraulic oil from the trucks and fork trucks is placed in a 400 gallon double-walled above ground storage tank located inside of the garage. The oil is burned in a Reznor, model RA-140, space heater to provide heat to the garage in winter months. The facility has a permit from MassDEP to operate the waste oil burner. The permit is Transmittal Number W046007 which was approved on December 11, 2003. The permit is valid and in effect for the life-time of the equipment.

Air Quality – Minimal products of combustion from the burning of waste oil in the space heater. The company burns less than 600 gallons per year.

E. WASTE STREAM MANAGEMENT& ASSOCIATED RECORD KEEPING

WMO#1 - Hazardous Waste Management

The company formerly used a Safety Kleen parts washing solvent that was considered a Hazardous Waste. The waste parts washing solution was manifested off-site under a D001, D018, and D039 waste code about once every 2 to 3 months at 101 pounds every shipment. In 2010, the company switched to using Safety Kleen Premium Solvent 150 which is considered a Waste Oil. The company manifests this waste parts washing solution under an MA01 waste code about once every 3 months at 101 pounds every shipment.

Violation - At the time of the inspection, the company was registered as a Very Small Quantity Generator (VSQG) of Hazardous Waste but did not register its status as a VSQG of Waste Oil. The company properly registered its VSQG of Waste Oil status on August 6, 2013.

WMO#2 – Wood Fired Furnace

The facility has a small wood fired furnace located in one of the support buildings which is used for heat in the winter time. It is a G&S Mill, Inc. boiler, model K-36, which was installed

in 1983 under MassDEP permit number CM-83-C-003. It is hand-fired with scrap lumber and used approximately twice per week during the heating season.

Waste Streams

Air Quality – Products of combustion from the burning of wood. The boiler is hand-fired with a maximum rate of 105 pounds per hour of wood waste providing an input of 830,000 BTU per hour. Employees keep track of how many pounds of scrap lumber are burned in the boiler per year to prepare for the triennial Source Registration (SR)/Emission Statement. The last SR was completed for calendar year 2010. The next one is due in 2014 for calendar year 2013 emission information.

Violation - The company had installed an opacity monitor and recorder for the wood fired furnace but stopped using it when the demand for the unit decreased.

WMO#3 – Saw Dust Fired Boiler

The facility uses a saw dust fired boiler to heat the lumber drying kilns. The boiler is automatically fed and rated at 9.25 million BTU per hour while burning saw dust from the moulding and milling operation. It is capable of burning 1,100 pounds per hour of waste saw dust. The exhaust from the boiler is vented to a roof-top cyclone. The collected wood ash from the cyclone is conveyed into two metal 30-35 gallon drums on the roof. At the time of the inspection, the boiler was operating and less than 10% white smoke was observed coming from the stack serving the unit.

A natural gas fired York Shipley boiler was located right next to the saw dust boiler. The boiler is rated at 225 hp and has been decommissioned and will no longer be used.

Waste Streams

Air Quality – Products of combustion from the burning of wood and particulate matter from ash handling. It takes approximately two weeks to fill the two 30-35 gallon drums of ash. At the time of the inspection, the ash containers were covered. The boiler is shut down a few times per year for maintenance and cleaning. The boiler has a meter on it which shows how much saw dust is burned. The information is obtained from this meter on a monthly basis and used to prepare for the triennial Source Registration/ Emission Statement.

Violation - The company did not install and operate an opacity monitor for the sawdust boiler.